



COUNTY OF LOS ANGELES  
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TO: SUPERVISOR GLORIA MOLINA, Chair  
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FROM: RAYMOND G. FORTNER, JR.  
County Counsel 

RE: **Environmental Lawsuit Challenging Los Angeles  
International Airport Master Plan**

This is to advise your Board that the County's lawsuit challenging the environmental documentation for the Los Angeles International Airport Master Plan will be filed today in Los Angeles Superior Court.

As we previously advised you, the lawsuit is a joint petition with the cities of Inglewood and Culver City. We associated with the law firm of Chevalier, Allen & Lichman, LLP, in the preparation of the lawsuit. That firm has substantial expertise in environmental and airport-related issues.

A copy of some bullet points regarding the lawsuit is enclosed for your reference. If you have questions concerning this matter, please contact me, Assistant County Counsel Richard D. Weiss at (213) 974-1921, or Principal Deputy County Counsel Thomas J. Faughnan at (213) 974-1823.

RGF:TJF:rw

Enclosure

c: David E. Janssen  
Chief Administrative Officer

Violet Varona-Lukens, Executive Officer  
Board of Supervisors

**COUNTY CEQA LAWSUIT CHALLENGING CITY OF LOS ANGELES LAX**  
**MASTER PLAN APPROVAL**

- The County has joined with the Cities of Inglewood and Culver City filing a petition for writ of mandate and complaint for injunctive and declaratory relief under the California Environmental Quality Act (CEQA) against the City of Los Angeles, Mayor Hahn, the City Council, Los Angeles World Airports and the Board of Airport Commissioners.
- The Petition will be filed today, January 6, 2005, in Los Angeles County Superior Court.
- The County Counsel's Office has associated with Barbara E. Lichman, Ph.D., of Chevalier, Allen & Lichman, LLP of Costa Mesa, CA, (714)384-6520, for the filing of this lawsuit.
- The Petition contends that the City's environmental impact report (EIR) for the project does not comply with CEQA because the EIR:
  - fails to disclose and affirmatively obscures the project's capacity-enhancing objectives;
  - uses an inappropriate baseline of 1996;
  - fails to adequately disclose and analyze the project's adverse environmental impacts, including air emissions impacts, flyaway terminal impacts, traffic and related impacts, such as from the Ground Transportation Center (GTC), and potential noise impacts on the adjacent communities;
  - does not properly address the project's environmental justice impacts;
  - does not provide for adequate and feasible mitigation measures; and
  - fails to explore reasonable alternatives to the project.
- The County seeks to have the court void the City's approvals of the LAX Master Plan project and set aside the EIR until the City fully complies with CEQA, declare that the EIR is inadequate and that all actions in furtherance of the project are unlawful, invalid, void and unenforceable, and enjoin the City from taking further action in furtherance of the LAX Master Plan project without full compliance with CEQA.